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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
IN RE:

Case No.: 16-12453  
Chapter 11 Reorganization

15 JOHN CORP.,  
a/k/a LES HALLES,  
a/k/a FIRST ADMIN INC.

Debtor.  
-----X

**NOTICE OF MOTION FOR  
COPMENSATION OF PHILLIPE LAJAUNIE AS PRESIDENT OF THE DEBTOR**

***PLEASE TAKE NOTICE*** that upon the annexed Application of the above Debtor for an Order authorizing payment of monthly compensation to Phillipe Lajaunie, as President of the Debtor, the undersigned shall move on April 5, 2017 at 10:00 a.m. in the forenoon before the Honorable Michael E. Wiles, United States Bankruptcy Judge in his Courtroom, United States Bankruptcy Court, Old Customs House, One Bowling Green, New York, New York 10004 for an Order authorizing payment of monthly compensation to Phillipe Lajaunie, as President of the Debtor, and for such other and further relief as is proper.

***PLEASE TAKE FURTHER NOTICE*** that any objection to the Motion must be in writing, must set forth in detail the grounds and facts of such objection and the legal basis therefore, must be filed with the Clerk of the Bankruptcy Court, Old Customs House, One Bowling Green, New York, New York, in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's case filing system and, by all other parties in interest, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered

directly to Chambers) and served in accordance with General Order M-242, and served so as to be received by (1) Leo Fox, Esq., as counsel to Debtor, 630 Third Avenue, 18<sup>th</sup> Floor, New York, New York 10017 and (2) The Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, New York 10014 on or before seven (7) business days before the scheduled Hearing Date herein (the "Objections Deadline").

Dated: New York, New York  
March 17, 2017

Yours etc.,

***15 JOHN CORP.***  
***a/k/a LES HALLES***  
***a/k/a FIRST ADMIN. INC.***

By: */s/ Leo Fox*  
Leo Fox, Esq. (LF-1947)  
Attorney for the Debtor  
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Case No.: 16-12453  
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15 JOHN CORP.,  
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Debtor.

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**APPLICATION FOR COMPENSATION  
OF PHILLIPE LAJAUNIE AS PRESIDENT OF THE DEBTOR**

15 John Corp., a/k/a Les Halles, a/k/a First Admin Inc., the Debtor and Debtor-in-Possession herein (the “Debtors”), by its attorney, Leo Fox, Esq., make this application (the “Application”) for entry of an Order (the “Order”), pursuant to Sections 522 of the Bankruptcy Code and respectfully represents:

**INTRODUCTION**

1. On August 25, 2016 (the “Petition Date”), the Debtors filed voluntary petitions in this Court for relief under Chapter 11 of the Code. The Debtors continue to operate their businesses as a Debtor-in-Possession pursuant to Code §§ 107(a) and 1108.

2. Pursuant to term sheet dated February 6, 2017, the Debtor and the Class Action Plaintiffs holding claims of \$5,000,000 have entered into a settlement providing the basis for the settlement of the Class Action Plaintiff’s claims and submission and confirmation of a Plan of Reorganization. Pursuant to that term sheet, the Class Action Plaintiffs have agreed that Phillipe Lajaunie, the Debtor’s principal, and President, is entitled to receive salary in the amount of

\$80,000 during 2017 (Section 4.1.1 of the term sheet).

3. It is respectfully requested that an Order be entered authorizing Phillipe Lajaunie to take compensation of \$6,666.66 per month. Phillipe Lajaunie has invested substantial amounts of time to the Debtor's success, has advanced funds, including the retainer to the Debtor's attorneys, has agreed to post the 100% equity interest of the Debtor into escrow and to release all claims against the Debtor for all monies being advanced by Phillipe Lajaunie under the Plan.

4. It is submitted that a working officer of the debtor corporation is entitled to be paid a fair salary for his work. Here, Phillipe Lajaunie's salary is substantially below what his salary was prior to the Chapter 11 case and what his reputation and experience would entitle him to receive. He should be entitled to be paid his compensation.

**WHEREFORE**, the Debtor respectfully requests that this Court enter an Order: (a) authorizing Mr. Lajaunie to be paid his compensation and reimbursement of expenses of the Retained Professionals on a monthly basis; and (b) granting the Debtor such other and further relief as may be just and proper.

Dated: New York, New York  
March 17, 2017

**15 JOHN CORP.**  
**a/k/a LES HALLES**  
**a/k/a FIRST ADMIN INC.**

By: /s/ Leo Fox  
Attorney for Debtor and Debtor-in-Possession  
630 Third Avenue – 18<sup>th</sup> Floor  
New York, New York 10017